

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

vs.

Criminal No. 05-358

DENNIS SKOSNIK

Defendant

MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE

AND NOW comes Defendant, SKOSNIK, by his attorney ,G. William Bills, Jr. , Esquire, and respectfully submits the following Motion for Early Termination Of Supervised Release:

1. The Defendant has been charged in an Indictment at Criminal Number 05-358 with: Wire fraud and scheme or artifice to deprive another of the tangible right of honest services in violation of 18 U.S.C. §§1343 & 1346; theft or bribery, concealing programs, receiving federal funds in violation of 18 U.S.C. §666(a)(1)(B); mail fraud and scheme or artifice to deprive another of the tangible right of honest services in violation of 18 U.S.C. §§1341 & 1346; laundering of monetary instruments in violation of 18 U.S.C. §1956(a)(1)(B); and tampering with witness, victim, or informant in violation of 18 U.S.C. 1512(c).

2. On June 1, 2006, United States District Court Judge Alan N. Bloch imposed the following Sentence: as to counts 1, 2, 7, 9, and 12 defendant was sentenced to imprisonment for 63 months at each count to be served concurrently and sentenced to 3 years of supervised release at each count to be served concurrently.

3. The Assistant United States Attorney for this case was Robert Cessar, Deputy United States Attorney., 700 Grant Street, Pittsburgh, Pa 15219.

4. Mr. Skosnik, served his Sentence at the Federal Correctional Institution (F.C.I.) at Beckley, in West Virginia, P.O Box 350, Beaver, WV 25813.

5. Mr. Skosnik, has been supervised since February 26, 2010 by Ramona Clark United States Probation Office, office (412-325-5021).

6. Mr. Skosnik has served twenty-four (24) months on supervised release as of March 3, 2012.

7. For the following reasons Mr. Skosnik requests the Early Termination of the Supervised Release:

- a. Mr. Skosnik has been compliant with the terms of his supervised release.
- b. On September 13, 2011, Mr. Skosnik's Probation Officer, Ramona Clark, filed a Report and Order with this Court requesting termination of Mr. Skosnik's supervised release based on his compliance. Officer Clark recommended that Mr. Skosnik is no longer in need of supervision. (See attached Exhibit 1)

8. Based upon these factors, Mr. Skosnik seeks early termination of his supervised release. Such early termination is authorized pursuant to 18 U.S.C. § 3583(e)(1).

9. According to 18 U.S.C. § 3583(e)(1), this Honorable Court may terminate supervised release if , after considering the factors set forth in 18 U.S.C. § 3553(a)(1), (a)(2)(B), (a)(2)(C), (a)(2)(D), (a)(4), (a)(5), (a)(6), and (a)(7), the defendant has been on supervised release for a minimum of one year and if such action is warranted by the

defendant's conduct and the interest of justice.

10. As set forth above , Mr. Skosnik has been on supervised release for a period of two years, and therefore meets the threshold to file the instant petition. See 18 U.S.C. § 3583 (e)(1) (providing that the court may terminate supervised release “at any time after the expiration of one year supervised release”).

WHEREFORE, for all the foregoing reasons, the defendant, Dennis Skosnik, respectfully requests that the within Motion for Early Termination of Supervised Release be granted, and that Mr. Skosnik's supervised release be terminated.

Respectfully Submitted,

/s/ G. William Bills, Jr., Esquire
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